

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

J.G.,)	
)	
Plaintiff,)	
)	Civil Action File
v.)	No. 1:20-cv-05233-SEG
)	
NORTHBROOK INDUSTRIES, INC.,)	
d/b/a UNITED INN AND SUITES,)	
)	
Defendant.)	

**CONSENT MOTION FOR EXTENSION OF TIME
FOR RESPONSE TO
PLAINTIFF’S SUPPLEMENTAL MOTION
PURSUANT TO LR54.2, NDGa
FOR ATTORNEY’S FEES AND EXPENSES AND
MEMORANDUM IN SUPPORT**

COMES NOW Defendant Northbrook Industries, Inc., d/b/a United Inn & Suites (“Defendant”), by and through its counsel of record, and hereby moves the Court for an extension of two weeks to respond to Plaintiff’s Supplemental Motion Pursuant to LR54.2, NDGa for Attorney’s Fees and Expenses (“Plaintiff’s Supplemental Motion”) [Dkt. #255].

In support of this motion, Defendant states that Plaintiff’s Supplemental Motion was filed on September 15, 2025. The motion is accompanied by an expert declaration, multiple other affidavits, and calculations of requested fees and

expenses. Defendant's response is presently due 14 days after the filing, which is Monday, September 29, 2025. Due to the volume of materials to which Defendant must respond, and the press of other matters being handled by the undersigned counsel, Defendant hereby requests an additional two weeks, or until Monday, October 13, 2025, to file its response to Plaintiff's Supplemental Motion. Counsel for Plaintiff has expressly consented to the requested extension.

Wherefore, Defendant respectfully requests that this motion be granted. A proposed Order is attached as Exhibit 1.

L.R. 7.1(D) CERTIFICATION

The undersigned counsel hereby certify that this filing has been prepared in Times New Roman (14 point), which are font and point selections approved by the Court in L.R. 5.1(C).

Respectfully submitted,

/s/ Dana M. Richens
Dana M. Richens
Georgia Bar No. 604429
SMITH, GAMBRELL & RUSSELL, LLP
1105 W. Peachtree NE, Suite 1000
Atlanta, Georgia 30309
Telephone: (404) 815-3659
Facsimile: (404) 685-6959
drichens@sgrlaw.com

Attorney for Defendant
Northbrook Industries, Inc.
d/b/a United Inn and Suites

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served all parties with the within and foregoing **CONSENT MOTION FOR EXTENSION OF TIME FOR RESPONSE TO PLAINTIFF'S SUPPLEMENTAL MOTION PURSUANT TO LR54.2, NDGa FOR ATTORNEY'S FEES AND EXPENSES AND MEMORANDUM IN SUPPORT** via the Court's CM/ECF electronic filing system, which will automatically provide notice of filing constituting service to all counsel of record.

This 25th day of September, 2025.

/s/ Dana M. Richens